

**EXHIBIT B**

Proposed Order

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Steven M. Abramowitz (No. 043641990)

**VINSON & ELKINS LLP**

1114 Avenue of the Americas, 32nd Floor  
New York, NY 10036

Telephone: (212) 237-0137

Facsimile: (917) 849-5381

Email: sabramowitz@velaw.com

*Local Counsel for Cyprus Amax Minerals Company*

Paul E. Heath

**VINSON & ELKINS LLP**

845 Texas Avenue, Suite 4700

Houston, Texas 77002

Telephone: (713) 758-3313

Facsimile: (713) 615-5056

pheath@velaw.com

-and-

Matthew W. Moran

Katherine Drell Grissel

**VINSON & ELKINS LLP**

2001 Ross Avenue, Suite 3900

Dallas, Texas 75201-2975

Telephone: (214) 220-7700

Facsimile: (214) 220-7716

mmoran@velaw.com

kgrissel@velaw.com

*Co-Counsel for Cyprus Amax Minerals Company*

In Re:

**LTL MANAGEMENT LLC**

Debtor.

Case No.: 23-12825 (MBK)

Chapter: 11

Judge: Honorable Michael B. Kaplan

**ORDER FOR ADMISSION PRO HAC VICE**

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Matthew W. Moran be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court  
District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, N.J. 07102  
*Attention: Pro Hac Vice Admissions*

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.